

EPNG Line No. 1903 Project

*SPIR PREVENTION,
CONTAINMENT, AND
COUNTERMEASURE PLAN*

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SPILL PREVENTION, CONTAINMENT, AND COUNTERMEASURE PLAN

1. INTRODUCTION

El Paso Natural Gas (EPNG) has prepared this Spill Prevention, Containment, and Countermeasure (SPCC) Plan to be implemented during construction of the Line No. 1903 Project in accordance with Section IV.A of the Federal Energy Regulatory Commission (FERC) Wetland and Waterbody Construction and Mitigation Procedures dated December 2, 1994. This SPCC Plan outlines specific preventive measures and practices to reduce the likelihood of an accidental release of a hazardous or regulated liquid and to expedite cleanup of any release that may occur during construction activities.

This SPCC Plan restricts the location of fuel storage, fueling activities, and construction equipment maintenance along the construction right-of-way (ROW) and provides procedures for these activities. Training and lines of communication to facilitate the prevention, response, containment, and cleanup of spills during construction activities are also outlined. The goals of this plan are to minimize the potential for a spill of these materials, to contain any spillage to the smallest area possible, and to protect areas that are considered environmentally sensitive (e.g., streams, groundwater wells, wetlands, etc.).

All contractor and subcontractor personnel working on the Line No. 1903 Pipeline ROW are responsible for implementation of the measures and procedures defined in this SPCC Plan. This plan will be included as written herein in both the bid and the contract documents as contractual requirements and instructions to the contractor.

2. PREVENTATIVE MEASURES

EPNG will require that the contractor will do everything practicable to minimize the potential for a spill during construction of the Line No. 1903 Pipeline facilities. EPNG will require the contractor to comply with applicable environmental and safety laws and regulations, including compliance by its subcontractors. The contractor will be required to ensure that a copy of this plan is available onsite to all contractor and subcontractor personnel.

2.1 TRAINING

All contractor employees and subcontractors involved with transporting or handling fueling equipment or maintaining construction equipment will be required to complete spill training before they commence work on the ROW. EPNG will audit contractor compliance with this requirement and instruct the contractor to replace any of its (or its subcontractors') employees found to be working on the ROW prior to having spill training. Spill training will also be required for contractor supervisory personnel and subcontractor supervisory personnel prior to commencement of work on the ROW for each spread.

Spill training programs will be conducted by the construction contractor and a representative of EPNG and will:

- provide information concerning pollution control laws;
- inform personnel concerning the proper operation and maintenance of fueling equipment; and
- inform personnel of spill prevention and response requirements.

Measures, responsibilities, and provisions of this SPCC Plan and identification of response team individuals (Attachment A) will be incorporated into the training.

Training for other workers will be provided through ongoing weekly meetings, which will be held to discuss safety and spill handling, including informing them of their personal responsibility to initiate appropriate procedures. These weekly sessions will be held by the contractor as crew "tail gate" meetings. EPNG will audit the contractor compliance with this requirement and instruct the contractor to replace any of its (or its subcontractors') foremen found to not be holding such meetings following the receipt of one warning.

2.2 RELEASE RESPONSE EQUIPMENT

The contractor will supply each construction crew with a sufficient quantity of absorbent and barrier materials to adequately contain and recover spills of on-board fuel and lubricants for the piece of equipment with the largest volume of fuel plus lubricant. These materials may include drip pans, buckets, absorbent pads, containment booms, straw bales, absorbent clay, sawdust, floor-drying agents, spill containment barriers, plastic sheeting, skimmer pumps, covered holding tanks, fire extinguishers, and other materials as necessary.

The contractor's Spill Coordinator (Section 4.1) will make known to all personnel involved with construction (foremen, laborers, inspectors), the contractor's yard, and warehouse locations of spill response equipment and materials. Spill response material will be readily accessible during construction.

2.3 EQUIPMENT INSPECTION

Prior to moving any equipment onto the construction ROW, the contractor will visually inspect each piece of equipment for cracks, excessive corrosion, or other flaws that may compromise the integrity of its fuel, hydraulic, or cooling systems. The contractor will repair or replace leaking equipment immediately after a leak is detected.

3. REGULATED MATERIALS STORAGE AND HANDLING

3.1 CONTRACTOR YARDS

Contractors will store fuel, petroleum products, and hazardous materials at the construction yards in safe locations within secondary containment structures. The secondary containment system normally consists of lining a bermed area with an impervious liner material to provide a minimum containment volume equal to 150 percent of the volume of the largest storage vessel contained within the bermed area. The contractor will construct these containment structures to

contain spilled or leaked liquids within the structures. If earthen containment dikes are used, they will be constructed with slopes no steeper than 3:1 (horizontal to vertical) to limit erosion and provide structural stability. Containment areas will not have drains.

Bulk storage tanks will not be placed in areas subject to periodic flooding or erosion. Accumulated rainwater may be removed if authorized by an Environmental Inspector under specific situations. Specifically, if visual inspection indicates that no spillage has occurred in the containment structure and if no sheen is present on the accumulated rainwater, the EPNG Environmental Inspector may approve the accumulated water to be pumped out and released on surrounding upland areas. If hydrocarbon spillage has occurred in the structure, accumulated wastewater will be drawn off and pumped into a storage vessel for proper disposal.

The contractor will visually inspect aboveground bulk tanks frequently and whenever the tank is refilled. Drain valves on temporary storage tanks will be locked to prevent accidental or unauthorized discharges from the tank. The Contractor will correct visible leaks in tanks as soon as possible.

All fuel nozzles will be equipped with functional automatic shut-off valves. Prior to departure of any fuel tank truck, all outlets on the vehicle will be examined by the driver for leakage and tightened, adjusted, or replaced to prevent liquid leaking while in transit.

Routine equipment maintenance of wheel-mounted vehicles such as oil changes will be accomplished at the contractor yards or staging areas to the greatest extent practical. Routine maintenance of track-mounted equipment will be conducted in a manner to gather all oil and other discharges and removed from the ROW to a suitable recycling or disposal site.

Storage containers will display labels that identify the contents of the container and whether the contents are hazardous. The contractor will provide and maintain copies of Material Safety Data Sheets (MSDS) for all materials accessible to all contractor personnel including subcontractors.

Attachment B presents typical vehicle and equipment fuels, lubricants, and hazardous materials stored or used during construction and briefly describes the location, typical quantities, and usual methods of storage. Storage methods and quantities vary with length of construction spread, time of year, and type of terrain. The contractor will provide, maintain, and make available the appropriate MSDS documents for all hazardous or controlled materials utilized on the ROW or in the contractor yards at a location accessible to all contractor, subcontractor, and EPNG employees.

3.2 ON THE RIGHT-OF-WAY

The contractor will undertake preventative measures to avoid environmental impacts from refueling and lubrication activities on the construction ROW.

Refueling and lubricating of construction equipment will be restricted to upland areas at least 100 feet away from the edge of any streams, wetlands, ditches, and other waterbodies and 150 feet from water supply wells wherever possible. Wheeled and tracked construction equipment will be moved to an upland area more than 100 feet away from streams, wetlands, ditches, and other waterbodies for refueling and at the end of each work day. Fuel and service truck drivers will be responsible for spill prevention during fueling and service activities and

drivers will be held responsible for observing and controlling fueling operations at all times to prevent overfilling.

Fuels and lubricants will be stored in designated areas and in appropriate service vehicles. Storage sites for fuels, other petroleum products, chemicals, and hazardous materials including wastes will be located in uplands. To prevent these materials and other contaminants from reaching waterways, no hazardous substances will be stored within 100 feet of streams and/or within 200 feet of groundwater wells (400 feet for public wells). The contractor will confirm with the Environmental Inspector the locations of areas where these activities are prohibited prior to construction crews entering the area with equipment.

The contractor will maintain a minimum of 20 lbs. of suitable commercial absorbent and barrier materials at each contractor yard and on fuel and service trucks to allow rapid containment and recovery of a spill. Absorbent and barrier materials will also be utilized to contain runoff from spill areas. Fuel trucks will also be equipped with shovels and an assortment of hand tools to aid in the containment of a spill.

Equipment will not be washed in streams, wetlands, ditches, or other waterbodies. Equipment operators will be held responsible for prompt reporting and mitigation of any fuel or lubricant spills from their equipment.

3.3 RESTRICTED REFUELING AREAS

Restricted refueling areas include areas where the buffer zone for refueling activities (100 feet from a wetland or waterbody, 200 and 400 feet from private and public water wells, respectively) cannot be maintained. Potential situations where plans may be approved by the Environmental Inspector to allow refueling in restricted areas include extensive wetland crossings with limited cross-ROW access, continuous construction at stream/river crossings, and the required placement and operation of stationary equipment such as dewatering pumps, generators, and boring/drilling equipment. The requirement for any refueling and equipment service within restricted areas will be verified and approved by the Environmental Inspector prior to carrying out such activity.

3.3.1 Tracked Equipment

Only a fuel truck with a maximum of 300 gallons of fuel may enter restricted areas to refuel construction equipment. Two trained personnel will be present during refueling to reduce the potential for spills or accidents.

3.3.2 Stationary Equipment

Equipment such as large stationary pumps may be fitted with auxiliary tanks as appropriate. Such auxiliary tanks will be placed within a secondary containment structure. Refueling of dewatering pumps, generators, and other small portable equipment will be performed using approved containers with a maximum volume of 10 gallons. Non-empty fuel containers will be stored in an upland area at least 100 feet from wetlands and waterbodies.

3.4 VEHICLE AND EQUIPMENT MAINTENANCE

All vehicle and equipment maintenance on the ROW involving fluid replacement will be conducted outside the boundary restrictions for wetlands, waterbodies, and water wells. Before lubricants are drained from the construction equipment, a suitable containment vessel and plastic sheeting will be placed under the equipment to collect any spilled material. The contractor will take necessary precautions to ensure that material that might accumulate on the liner does not spill on the ground surface. Vehicle maintenance wastes, including used oils and other fluids, will be handled and managed by personnel trained in the procedures outlined in this plan. Vehicle maintenance wastes will be stored and disposed of in accordance with applicable environmental regulations.

4. SPILL RESPONSE

In the event of a spill, the release will be contained and cleaned up as soon as possible. The order of priorities after discovering a spill are to protect the safety of personnel and the public, minimize damage to the environment, and control costs associated with cleanup and remediation. The initial response to an emergency will be to protect human health and safety, and then the environment. If a spill is not contained within a dike, an area of isolation will be established around the spill. The size of this area will depend on the size of the spill and the materials involved. The contractor will take precautions in the area of a spill to eliminate possible sources of ignition.

4.1 SPILL COORDINATOR

The contractor will appoint a Spill Coordinator who will be responsible for the reporting of spills, coordinating contractor personnel for spill cleanup, subsequent site investigations, and associated incident reports. The Spill Coordinator will report to the Environmental Inspector and may be removed from that role by EPNG at EPNG's discretion. In the event of a spill, the Spill Coordinator, along with the Environmental Inspector, will be responsible for determining the extent of the isolation area.

4.2 IMMEDIATE RESPONSE

All spills regardless of size must be reported to the spill coordinator and/or the EPNG environmental inspector. The person observing the incident will take the following actions:

- Assess the safety of the situation (including the risk to the surrounding public).
- If safe to do so, make every effort to remove potential ignition sources and stop the source of the spill.
- Promptly notify the contractor's Spill Coordinator and/or EPNG's Environmental Inspector. Report your name, the spill location, and the extent of the incident.

Upon learning of the spill, the Spill Coordinator will implement the following measures:

- For an upland spill, if necessary, berms will be constructed with available equipment to physically contain the spill.

- Sorbent materials will be applied to the spill area. Contaminated soils and vegetation will be excavated and temporarily placed on and covered by plastic sheeting in a containment area a minimum of 100 feet away from any wetland or waterbody, until proper disposal is arranged.
- If a spill is beyond the scope of on-site equipment and personnel, an Emergency Response Contractor will be secured to further contain and clean up the spill.

4.3 WETLAND OR WATERBODY RESPONSE

Regardless of size, the following conditions apply if a spill occurs near or into a stream, wetland, or other waterbody:

- For spills in standing water, floating booms, skimmer pumps, and holding tanks will be used as appropriate by the contractor to recover and contain released materials on the surface of the water.
- For a spill threatening a waterbody, berms and/or trenches will be constructed to contain the spill before it reaches the waterbody. Deployment of booms, sorbent materials, and skimmers may be necessary if the spill reaches the water. The spilled product will be collected and the affected area cleaned up in accordance with appropriate state or federal regulations.
- Contaminated soils in wetlands must be excavated, and placed on and covered by plastic sheeting in approved containment areas a minimum of 100 feet away from the wetland or waterbody. Contaminated soil will be disposed of as soon as possible in accordance with appropriate state or federal regulations.

5. REPORTING

With assistance from the Environmental Inspector, the Spill Coordinator is responsible for the completion of the Line No. 1903 Project Spill Report Form (Attachment C). Completion of this form will assist in the assessment of the spill and provide information necessary for agency notification. The form will be completed and submitted to the EPNG representative within 24 hours of the occurrence. The EPNG representative will also notify the appropriate agencies (see Section 6.0).

6. NOTIFICATIONS

In the event of an accidental release of a reportable quantity, EPNG or its representative will notify the appropriate federal, state, and local agencies.

6.1 FEDERAL AND STATE AGENCIES

National Response Center (Washington, D.C.)
Phone: (800) 424-8802 (24 hours)

Arizona Department of Environmental Quality
Emergency Response Unit

Phone: (602) 207-2330

California Office of Emergency Services
Phone: (800) 852-7550 or (916) 262-1621

24-hour Warning Center
Phone: (916) 262-1621

CO River Basin Regional Water Quality Control Board
(760) 346-7491

Lahontan Region Water Quality Control Board
(760) 241-6583

Central Valley Region Water Quality Control Board
(559)-445-5116

Attachment A: Response Team Contacts

LINE NO. 1903 PROJECT
RESPONSE TEAM CONTACTS

NAME:

TITLE/POSITION:

PHONE NUMBER:

CONSTRUCTION CONTRACTOR SPILL COORDINATOR:

ENVIRONMENTAL INSPECTOR:

AUTHORIZED ALTERNATE (Contact only if you are unable to reach the EI):

CONSTRUCTION CONTRACTOR SUPERINTENDENT:

CHIEF INSPECTOR:

OTHER LINE NO. 1903 REPRESENTATIVES:

Attachment B: Typical Fuel, Lubricants, and Hazardous Materials

Typical Fuel, Lubricants, and Hazardous Materials

Fluid Uses	Fluids	Typical Quantity Per Site in Gallons	Method of Storage	Storage Location
Fuels	Diesel	5,000-10,000	Tanks or Tankers	Contractor Yard, Warehouse/fuel vehicle parking areas
	Gasoline	5,000-10,000	Tanks or Tankers, 10-Gallon Containers, or Pick-up Tanks	Contractor Yard, Warehouse/fuel vehicle parking areas
Lubricants	Engine Oil	<100	Bulk Storage or Retail Packaging	Contractor Yard Warehouse
	Transmission/ Drive Train Oil	<50	Retail Packaging on Service Trucks	Contractor Yard Warehouse, Service Trucks
	Hydraulic Oil	<100	Bulk Storage or Retail Packaging	Contractor Yard Warehouse, Service Trucks
	Gear Oil	<50	Retail Packaging on Service Trucks	Contractor Yard Warehouse, Service Trucks
	Lubricating Grease	<25	Tubes stored in Paper Cases	Contractor Yard Warehouse, Service Trucks
Misc./ Coolants, Hydraulic Fluids	Ethylene Glycol	<100	Bulk Storage or Retail Packaging	Contractor Yard Warehouse, Service Trucks
	Propylene Glycol	<100	Bulk Storage or Retail Packaging	Contractor Yard Warehouse, Service Trucks
	Power Steering Fluid	<50	Retail Packaging on Service Trucks	Contractor Yard Warehouse, Service Trucks
	Brake Fluid	<50	Retail Packaging on Service Trucks	Contractor Yard Warehouse, Service Trucks
	Propane	25-100	Pressurized Tanks	Contractor Yard Warehouse, Welding Trucks

Attachment C: Spill Report Form

LINE NO. 1903 PROJECT
SPILL REPORT FORM

Date/time of spill: _____

Date/time of spill discovery: _____

Name and title of discoverer: _____

Milepost/Legal Description:
_____Material spilled/Estimated volume:
_____Unique qualifier, if relevant, such as manufacturer:
_____Media in which the release exists: (circle: sand, silt, clay, upland, wetland, surface water, other):
_____Topography and surface conditions of spill site:
_____Proximity to wetlands and surface waters (including ditches):
_____Proximity to private or public water supply wells:
_____Directions from nearest community:
_____Weather conditions at the time of release:
_____Describe the causes and circumstances resulting in the spill:

_____Describe the extent of observed contamination, both horizontal and vertical (i.e., spill-stained soil in a 5-foot radius to a depth of 1 inch):

_____Describe immediate spill control and/or cleanup methods used and implementation schedule:

Location of any excavated/stockpiled contaminated soil:

Describe the extent of spill-related injuries and remaining risk to human health and environment:

Name, company, and telephone number of party causing spill (e.g., contractor):

Current status of cleanup actions:

Name and company for the following:
Construction Superintendent:

Spill Coordinator:

Environmental Inspector:

Chief Inspector:

Landowner notified (if appropriate): _____

Date: _____

Form completed by:

Date: _____

Government agency notified (to be completed by EPNG or EPNG's Representative):

DATE: _____

Spill coordinator must complete this form for any spill, regardless of size, and submit the form to the EPNG representative and environmental inspector within 24 hours of the occurrence.